

Message

From: Rodriguez, Jason [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6972399AC1B842A98464F0B1559DEBDE-RODRIGUEZ,]
Sent: 8/24/2018 7:10:16 PM
To: Kenknight, Jeff [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=803cda0c34f14c298367a1c90825ef16-Kenknight, Jeff]
CC: Grandinetti, Robert [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9c73f8984588411fa3df484d6386a013-Grandinetti, Robert]
Subject: RE: Media query - Kitsap Sun: Naval Base Kitsap wastewater spill -- deadline Aug. 27

That's a State issued permit (in expired status) not EPA. There would have been no reason for the facility to send it our way. If there is a data entry issue with the report it would be on the WDOE side. Feel free to call if you would like to discuss before you respond Rob.

-Jason



Jason Rodriguez | U.S. Environmental Protection Agency
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From: Kenknight, Jeff
Sent: Friday, August 24, 2018 11:47 AM
To: Rodriguez, Jason <Rodriguez.Jason@epa.gov>
Cc: Grandinetti, Robert <Grandinetti.Robert@epa.gov>
Subject: FW: Media query - Kitsap Sun: Naval Base Kitsap wastewater spill -- deadline Aug. 27

Jason – can you look at the last Question and Rob response about the report that was never submitted according to ICIS. Can you see if the report is on the share drive but not in ICIS for some reason?

From: Grandinetti, Robert
Sent: Friday, August 24, 2018 11:42 AM
To: Skadowski, Suzanne <Skadowski.Suzanne@epa.gov>; Poulsom, Susan <Poulsom.Susan@epa.gov>; Lidgard, Michael <Lidgard.Michael@epa.gov>; Burgess, Karen <Burgess.Karen@epa.gov>; Kenknight, Jeff <Kenknight.Jeff@epa.gov>; Levo, Brian <Levo.Brian@epa.gov>; Drabek, John <Drabek.John@epa.gov>
Cc: MacIntyre, Mark <Macintyre.Mark@epa.gov>; Holsman, Marianne <Holsman.Marianne@epa.gov>; Morrison, Kay <morrison.kay@epa.gov>; Rodriguez, Jason <Rodriguez.Jason@epa.gov>
Subject: RE: Media query - Kitsap Sun: Naval Base Kitsap wastewater spill -- deadline Aug. 27

Susan and Karen,

Is there an attorney that deals with just federal NPDES permits in ORC that may need to take a look at this. Also, I can't find (other than in ICIS) the permit number WAP007374. It looks like a general industrial permit, but I can't find it in our NOI database... Any ideas.

Jason,

There is a report they (WAP007374 – Puget Sound Naval Base industrial permit) that has not been submitted to EPA. Is it possible we have this report and we just did not enter it into ICIS? Here is the screen shot from ICIS.

| Document ID | Document Description | Document Type | Document Status | Document Creation Date | Document Last Modified Date |
|---|----------------------|---------------|-----------------|------------------------|-----------------------------|
| 34 P C8011 Plan, Report, or Scope of Work | CAO | 05/10/2018 | N | 06/10/2018 | 1/09/18/2018 |

Here are my responses (below in bold).

Rob Grandinetti
CWA Enforcement Specialist
EPA Region 10
Phone: 509-376-3748

From: Skadowski, Suzanne
Sent: Friday, August 24, 2018 10:18 AM
To: Grandinetti, Robert <Grandinetti.Robert@epa.gov>; Poulson, Susan <Poulson.Susan@epa.gov>; Lidgard, Michael <Lidgard.Michael@epa.gov>; Burgess, Karen <Burgess.Karen@epa.gov>; Kenknight, Jeff <Kenknight.Jeff@epa.gov>; Levo, Brian <Levo.Brian@epa.gov>; Drabek, John <Drabek.John@epa.gov>
Cc: MacIntyre, Mark <Macintyre.Mark@epa.gov>; Holsman, Marianne <Holsman.Marianne@epa.gov>; Morrison, Kay <morrison.kay@epa.gov>
Subject: RE: Media query - Kitsap Sun: Naval Base Kitsap wastewater spill -- deadline Aug. 27

Added a new Q from reporter today.

Her deadline is Monday, Aug. 27. I'm out of the office next week, so I've cc'ed Mark and folks who will help circle back to the reporter.

From: Skadowski, Suzanne
Sent: Friday, August 24, 2018 8:09 AM
To: Grandinetti, Robert <Grandinetti.Robert@epa.gov>; Poulson, Susan <Poulson.Susan@epa.gov>
Cc: Lidgard, Michael <Lidgard.Michael@epa.gov>; Burgess, Karen <Burgess.Karen@epa.gov>; Kenknight, Jeff <Kenknight.Jeff@epa.gov>; Levo, Brian <Levo.Brian@epa.gov>; Drabek, John <Drabek.John@epa.gov>
Subject: Media query - Kitsap Sun: Naval Base Kitsap wastewater spill

Hi Rob & folks:

Please help me respond to the reporter's Qs below. I've drafted some replies based on my understanding and info from you all. Please edit and address the Qs as best as you can, understanding that we do not have complete answers to these Qs.

Thank you!
Suzanne

Suzanne Skadowski
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From: Stanford, Julianne [<mailto:jstanford@kitsapsun.com>]
Sent: Thursday, August 23, 2018 4:58 PM
To: Skadowski, Suzanne <Skadowski.Suzanne@epa.gov>
Subject: Media query - Kitsap Sun

Hi Suzanne,

Thanks for bearing with all of my phone calls in the past week!

I'm looking to follow up on the wastewater spill discovered at Naval Base Kitsap last week, and I have a few questions that I hope you might be able to answer:

- 1) Did any violations of environmental regulations occur with this spill? If so, would I be able to get a copy of the notice of violation?

EPA: An unauthorized (unpermitted) discharge of wastewater or other pollution into waters of the U.S., in this case Sinclair inlet, could be a violation of the Clean Water Act. EPA is reviewing the Navy's reported blocked sewage line break. EPA does not comment on any pending or ongoing compliance or enforcement actions. [but can I say that EPA has not issued a notice of violation?] **You can say EPA has not issued an NOV, as we are still gathering information.**

- 2) Is there any sort of penalty for the delay in reporting the spill? Any penalty for potential violations?

EPA: The Navy's sewage line is part of the facility's sanitary/domestic wastewater collection system that goes to the Bremerton wastewater treatment plant authorized (permitted) by WA Department of Ecology. The facility's domestic wastewater collection system does not require an EPA permit. Since there is no EPA permit for the Navy's sewage line, the Navy is not required to report a spill from this system to EPA. [Is this accurate? Did they have to notify us under any provision of the CWA or any other rule?] See response #1 above regarding any penalty for potential violations. **There is no requirement to report spills under the CWA.**

- 3) What is the impact of a spill of that size to the water? What's the risk to the public of potentially being exposed to contaminants in the water for the additional four days after the spill was discovered?

EPA: EPA is reviewing the Navy's reported blocked sewage line break and spill. When sanitary sewers malfunction, break or otherwise fail, they can release raw sewage. These types of releases can degrade water quality and expose humans to pathogens and viruses that can cause illness. The specific impacts to the environment or to public health from the Navy's reported blocked sewage line break and spill are unknown at this time. **That looks good to me.**

- 4) I also wanted to follow up with you in regards to the Navy's wastewater/stormwater/general permits, like we spoke about earlier this week. When I checked the EPA's NPDES permits database online, it looks like PSNS' permit expired in 1999. Would you be able to send me a copy of whatever is their current permit?

EPA: The following link includes EPA's National Pollutant Discharge Elimination System (NPDES) final permit and supporting documents for the U.S. DOD Puget Sound Naval Shipyard Wastewater (Stormwater only) Treatment Plant discharging to Sinclair Inlet in Bremerton, Washington. Permit number: WA0002062 Effective date: April 1, 1994 Permit expires: April 1, 1999 (administratively extended) [NPDES Permit for Puget Sound Naval Shipyard Wastewater Treatment Plant in Washington](#)

This is an industrial stormwater permit, and the industrial water is separate from the domestic/sanitary wastewater. This permit does not apply to the Navy's reported blocked sewage line break. Also, above the treated steam plant wastewater is their boiler water (how they heat their facilities and generate electricity, essentially hot water). Under this permit the Navy is authorized to discharge drydock drainage and noncontact cooling water from outfalls 018 (including 018A and 096) and 019, treated steam plant wastewater from outfall 021, and stormwater runoff, demineralized water, steam condensate, salt water supply system, and potable water from the remaining outfalls.

The Navy's reported blocked sewage line is part of the Navy's sanitary sewage collection system that goes to the Bremerton wastewater treatment plant authorized (permitted) by WA Department of Ecology.

There are three EPA-issued permits for wastewater treatment plants in that area. The blocked sewage was not en route to any of these plants:

- Naval Air Station – Whidbey Island Seaplane Base Wastewater Treatment plant (jurisdiction with Ecology until Dec. 27, 2018). EPA permit was just issued, effective 12/27/2018).
- Naval Air Station – Whidbey Island Ault Field (expired 2/28/2016)
- Naval Base Kitsap Bangor (expired 8/31/2015)

- 5) The shipyard's detailed facility report on the EPA's Enforcement and Compliance History Online portal, it looks like PSNS has been noncompliant with the Clean Water Act for all 12 of the last 12 quarters, with two "significant" violations. That seems like quite a while to be out of compliance. Is that accurate, or has their profile not been updated? What were those significant violations?

EPA: EPA: This is a bit confusing, as there are 3 permits associated with this particular site, one is the individual industrial permit, and the other 2 are general industrial permits (I think). The general permits can be pulled if they have intermittent work on the site (work on a ship in an area not covered by the individual industrial permit). The 12 quarters of exceedance are associated with WAP007374, which is an individual industrial permit most likely covered under our general permit, however, this permit expired in 2016, and is NOT administratively extended. There was a report due in May of 2016 and it shows it was not reported to EPA, therefore, every quarter from May of 2016 until the report is submitted is a violation, so this is only ONE violation, but gets carried forward because of the failure to submit back in 2016 (it is possible that we have the report and it just was not entered into ICIS).

All the best,

Julianne Stanford

Military Affairs reporter, *Kitsap Sun*



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